



M.J. "MIKE" FOSTER, JR.
GOVERNOR

JACK C. CALDWELL
SECRETARY

DEPARTMENT OF NATURAL RESOURCES

September 11, 2000

Mississippi River/Gulf of Mexico Watershed Nutrient Task Force
Mississippi River/Gulf of Mexico Action Plan (4503F)
c/o U.S. Environmental Protection Agency
1200 Pennsylvania Avenue NW
Washington, DC 20460

Re: Comments on the Draft Plan of Action for Reducing, Mitigation, and Controlling
Hypoxia in the Northern Gulf of Mexico

Members of the Task Force:

We offer our comments on the draft action plan in connection with hypoxia in the
Northern Gulf of Mexico.

Purpose and Background, page 2

Please list the members of the Task Force with contact information.

Background on the Issue, page 3

Be consistent with the measurement of area, square miles (1st paragraph) versus square
kilometers (1.B of long-term goals, page 4)

Long-Term Goals, page 4

1. Coastal Goal

We recommend goal 1.A. Federal, state, local and tribal authorities should strive to
coordinate their efforts toward achievement of the most ambitious of the three proposed goals.
In addition, goal 1.A should most readily lend itself to quantitative analysis of both pollution
reduction methods and results.

Goal 1.C should be incorporated or considered to be an action item of Goal 1.A.

Implementation Actions, page 5

If this listing is not in error, the list of actions would be clearer and easier to follow if they

were in chronological order. It is confusing when action #6 occurs in 2001 whereas action #5 occurs in 2002.

Key Roles and Responsibilities, page 7
States, Tribes and Federal Agencies

First bullet: Insert after the first sentence ending with "...nutrient enrichment", the following paragraph:

"In addition, priority will be placed on the use of supplemental federal, state, tribal and local funding for pollution-abating benefits associated with projects in which variable costs may impose or limit maximum environmental benefits. An example of such a project would be where a minimal increase in federal monies available would maximize positive environmental benefits, such as the creation of wetlands as pollution buffers and filtration zones, from routine maintenance dredging. This supplemental funding would overcome variable cost constraints, e.g., the federal standard. Such projects would be possible because the cost of mobilization and demobilization would not be a limiting factor thus enabling the use of previously cost-prohibitive equipment."

7th Bullet: Insert after "...using mechanisms such as the Clean Water Action Plan," the following:

"Coastal Nonpoint Pollution Control Programs (CNPCP) under Section 6217 of the Coastal Zone Act Reauthorization Amendment of 1990,".

Adaptive Management: Action, Monitoring and Research, page 9

Under "Education" insert after "increasing the stakeholder" the following: *"and national"*.

Sincerely,


Gregory J. DuRoi
Program Manager, Interagency Affairs

/lp